SOAH DOCKET NO. 582-20-1895
TCEQ DOCKET NO. 2019-1156-IWD

APPLICATION OF PORT OF CORPUS CHRISTI AUTHORITY OF NUECES COUNTY FOR TPDES PERMIT NO. WQ0005253000	**BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS**

Aligned Pro-se group of Stacey Barlett, Jo Ellyn Krueger, Sarah Searight, Lisa Turcotte

Closing Arguments

To the Honorable Administrative Law Judges Rebecca Smith and Cassandra Quinn:

Comes now, the aligned Pro-se group and files this closing argument.

I. Introduction

The Port of Corpus Christi Authority of Nueces County, Texas applied for a new Texas Pollutant Discharge Elimination System (TPDES) permit on March 3, 2018. In the aftermath of Hurricane Harvey on August 25, 2017, most people were unaware of this application, because of the POCCA's failure to disclose any plans for Harbor Island, within the city limits of Port Aransas, Texas. After discovery was made by members of the community, a large outcry started with citizens and the City of Port Aransas. After several public meetings, a TCEQ open meeting was held on April 8, 2019.

Numerous private citizens, the City of Port Aransas and the newly formed Port Aransas Conservancy were granted a Contested Case Hearing with SOAH. Many private citizens later dropped out due to not understanding how the process worked. The City of Port Aransas was sued by the Port of Corpus Christi Authority and it too eventually withdrew contested status because of legal costs. The Port Aransas Conservancy (attorney represented), James and Tammy King with Edward and Sam Steves (attorney represented), the Texas Audubon Society (pro-se) and the aligned pro-se group of Stacey Bartlett, Jo Ellyn Krueger, Sarah Searight and Lisa Turcotte were survivors of the process.

After the evidentiary Hearing on Merits, November 4 – 6 and 9 – 10, 2020, closing arguments were submitted and the record was closed on January 12, 2021. ALJs, Rebecca Smith and Cassandra Quinn, issued a Proposal for Decision on February 5, 2021 and recommended denial of the Port of Corpus Christi Authority's application.

On May 19, 2021, the TCEQ Commission remanded the application back to SOAH to take additional evidence on several referred issues. The second Contested Case Hearing began on March 14, 2022 and concluded on March 25, 2022.

II. Remand Referred Issues

Remand item A: Whether the proposed discharge will adversely impact: the marine environment, aquatic life and wildlife, including birds and endangered or threatened species, spawning eggs or larval migration.

The pro-se group believes the POCCA and TCEQ failed to show there will be no harm to aquatic life, especially larval migration through the channel. Port expert, Mr. Randy Palachek, admitted in his testimony that it will be possible for larvae to travel through the Zone of Initial Dilution (ZID). Numerous testimonies from PAC experts are clear that many larval species under 10 days old are likely to be in the channel. Different species spawn at various times of the year making larval transport an ongoing if not a daily occurrence.

As stated by the ED's witness, Shannon Gibson, there must be no lethality to aquatic organisms that move through the ZID. (30 TEX Admin Code 307.8(b)(2)). Though we understand there are questions about the interpretation of lethality, specifically significant lethality, it does not appear the ED's witnesses were in agreement on interpretations of the TAC code.

The amount of discharge could be 95,600,000 gallons/day, up to 110,000,000 gallons/day. A flowrate of 96,000,000 gallons/day equals 4,000,000 gal/hour, discharged every day. Another way of looking at the volume is it equals 2,285,714 barrels/day. To give a visual, 2,285,714 barrels equals over 2 fully loaded VLCCs of brine being dumped daily into the ship channel. A Very Large Crude Carrier (VLCC) is over 1,000 feet in length and 192 feet in width. TCEQ refers

to all this discharge as effluent, but it really is just concentrated brine. How can salinity not be considered when this is what we are talking about?

Multiple discussions occurred in the first hearing and in the remand hearing about the possibility of an eddy. The Port's representative, Sarah Garza, was the original source of the eddy theory, long before there was a contested case. We know this because at 2 public meetings (January 2019 and August 2019), Ms. Garza mentioned the deep hole off of Harbor Island and attributed it to eddy currents. At the first hearing the Port essentially theorized the eddy would help with mixing the effluent. Now, for the remand hearing, the eddy theory has been thrown out the window and according to Port experts and Ms. Garza it doesn't matter whether an eddy is present or not. As it stands with the Port, it is maybe, so yes, or maybe, so no, about an eddy, but they have clearly contradicted the majority of their argument from the first hearing.

Dr. Stunz talked about the "washing machine" effect around the confluence of channels. We know this to be a true and regular occurrence. An eddy does not necessarily mean a whirlpool. Websters dictionary gives a simple description: "*Eddy – a water or air current that runs contrary to the primary current."* This contrary current is pretty much a daily occurrence. Unfortunately, we could not submit the video from December 21, 2021, but for over two hours, Cathy Fulton observed and filmed an "eddy" as it slowly moved through the channel. There were 2 clearly defined currents running contrary to the incoming tidal current. Simply put, there was a clear line of demarcation on both sides of the incoming tide, with the contrary flow going out toward the gulf. This contrary flow was directly over the proposed point of discharge.

Note the rip current carrying oranges back toward GOM and discharge location

In January 2022, Cathy Fulton and a few locals went to the discharge location and conducted a few non-scientific experiments with oranges. Ten oranges were tossed in, at and around the discharge location while the tide was incoming. All the oranges did what one would expect, they floated toward Corpus Christi with the incoming tide. About 25 minutes later, the oranges changed direction and started floating opposite the incoming tide and eventually ended up back near the discharge location. Whether you call it a rip current or eddy, that is what carried the oranges in the opposing direction. Around 30 minutes after being caught in the rip current, the oranges were kicked out of the current and ALL of them floated to the shoreline of Harbor Island and several ended up in the area referred to as the "groin". To be clear, all 10 oranges ended up on Harbor Island. How will rip currents affect the effluent dispersion? Cormix modeling cannot accurately model multiple currents, especially 2 or more currents running in opposing directions.

Another issue is a slack tide. Slack tides may be as short as 10 or 15 minutes but other times, as Dr. Stunz and Mr. Scott Holt pointed out, a slack tide can last for several hours. Again, we regularly observe this occurrence. When considering the effluent discharge, how well will the effluent mix during an extended slack tide? If it does not mix well, the plume will sink to the bottom of the 90' hole. Port experts did not observe a long slack tide because they were only on the water 4 days, yet they opine the slack tides are of no consequence when it comes to mixing. We strongly disagree with their conclusion.

Port expert, Dr Nathan Knott, was part of a team that worked on design and discharge for the desalination plant in Sydney, Australia. Dr. Knott thinks effluent discharge into the ship channel off Harbor Island will not affect marine populations because of the proposed diffusers. In response to questions about whether or not desalinated waste water was discharged into Botany Bay or the channel, Dr. Knott stated, *"No and that was one of the concerns, if you discharged into this area, would you then pour water (desal) into Botany Bay and affect that waterway."* When observing the Botany Bay area with the channel to the Pacific Ocean, it is a relatively small and rather wide-open system with a very short channel. We suspect Botany Bay has a greater amount of water exchange rate as compared to the 1.4-year water exchange rate in the Corpus Christi Bay System, yet the Sydney Plant intake and discharge is offshore. If Sydney officials and Dr. Knott were concerned about discharge in a system that is clearly

“flushed” on a continual basis, why would the POCCA or TCEQ even consider discharge into our poorly flushed bays and estuaries?

A glaring omission by TCEQ and the POCCA, is the fact our local bays have outbreaks of red tides. Red tide is a algal bloom harmful and deadly to marine species. *Karenia brevis* produces brevetoxins that can affect the central nervous system of fish and other vertebrates, causing these animals to die. Wave action can break open K. brevis cells and release these toxins into the air, leading to respiratory irritation. The red tide toxins can also accumulate in filter-feeders such as oysters and clams, which can lead to neurotoxic shellfish poisoning in people who consume contaminated shellfish.

As referenced in the research article, *An assessment of trends in the frequency and duration of Karenia brevis red tide blooms on the South Texas coast (2020),* “Salinity was positively correlated with red tide occurrence in the Nueces Estuary, and documented long-term increase in salinity of the Nueces Estuary may be a major factor in the long-term increase in bloom frequency.” The study also states, “Blooms in Texas are frequently transported into estuaries and there is also anecdotal evidence of blooms developing within the estuary as opposed to coastal waters.” “The most notable effects (of red tide) are fish kills, shellfisheries closures, marine mammal and seabird mortality, and respiratory and digestive distress in humans.”

Red tides do not always start offshore. In 2012 there was an outbreak within the Corpus Christi Bay system (AKA Nueces Estuary) that was “drifting in the bay (out) through the Port Aransas Jetties”. Several of us remember this outbreak and how horrific it was because of all the dead marine life washing up on shorelines and the jetties. Thousands upon thousands of dead fish were everywhere. Respiratory irritation does not adequately describe the physical effects to humans and other animals. It truly is impossible to be outside, because you just can’t breathe.

We are not rocket scientists but, when considering water quality and its effects on the marine environment, how can red tide blooms not be considered? If over two million barrels of brine is dumped daily into these waters, and increased salinity is directly linked to red tide frequency, there is no question this must be considered for not just this desalination application, but for all future applications along the Texas coast.

According to Dr. Montagna's study, Vulnerability Assessment of Coastal Bend Bays (December 2021), "average salinities (Nueces Estuary) are already at levels that could impact species abundance and diversity, and therefore, SMALL INCREASES IN SALINITY could add additional pressure on a system that is already experiencing salinity stress." Further, the study is clear that salinity change affects most species in different ways. Though everyone seems focused on red drum, as Dr. Stunz, Mr. Holt, Dr. Esbaugh, Dr. Nielsen and others stated there are other more sensitive species to salinity changes. "The most sensitive species to salinity change were blue crab, Atlantic croaker and white shrimp." (Montagna 2021). Both the POCCA and TCEQ continue to disregard valid studies.

Remand Item C: Whether the proposed discharge will adversely impact recreational activities, commercial fishing, or fisheries in Corpus Christi Bay and the ship channel.

Please consider the response to item A above as part of the response to item C. We wish to clarify, Corpus Christi Bay must be considered the Corpus Christi Bay System, AKA the Nueces Estuary as it includes several bays, not just one. The primary fishery bay is Redfish Bay adjacent to the proposed discharge location. This is the primary bay for larval recruitment and survival that supports fish populations for the surrounding bay systems.

In January, Cathy Fulton went out to the discharge location with a few other locals. While there at the point of discharge, she observed four dolphins for almost 2 hours feeding on a school of fish about 25 feet below the water surface. On that same day, there were six boats anchored just past the warning sign adjacent to the proposed point-of-discharge. Redfish and sheepshead were the big catch of that day. Almost everyday people are anchored in this general location and why? Because it is one of the best damn fishing spots.

Boats anchored just adjacent to point-of-discharge

We know that the Aransas Pass inlet is critical to sustaining healthy marine populations, yet the proposed discharge will be a toxic pollutant to sensitive larvae incapable of swimming to avoid contact with the plume. Plenty of larvae do not succeed making it to a protected area to grow. But those larvae do not just die, they get consumed by a multitude of marine life. Dead larvae are less likely to sustain the natural food chain. The POCCA and TCEQ claim not many larvae will travel through the 3 different zones, especially the ZID, but our daily observations indicate otherwise. Those 4 dolphins were feeding on a school of relatively small fish. Those small fish were likely feeding on LIVE plankton consisting of larval fish and invertebrates. All of this activity was at the ZID.

As we stated in the opening statement, for several decades, Corpus Christi had the largest oyster fisheries in Texas. Commercial oyster fisheries in Texas are all in decline, and there is no longer a viable commercial oyster fishery in the Nueces Estuary. Rising salinity levels are the number one reason for the decline in oyster habitat. Why is this important? Oysters are the water filters that clean the bay waters. Higher salinity has not only affected oyster populations, it affected most shell fish populations.

According to the Coastal Conservation Association, *"The Corpus Christi and Aransas Bay systems offer abundant fishing opportunities, and both are favored fishing destinations for locals and visitors alike." "Marine recreational fishing in these bay systems supports a combined 1,249 jobs, and generates $44.9 million in labor income, $69.5 million in GDP contribution and*

$122.7 million in total economic impact. Without healthy fisheries, the local economy supported by recreational fishing, birding and tourism will suffer greatly." These comments were submitted to TCEQ and we believe they were considered during the first hearing.

Point of Discharge just past warning sign, Harbor Island shoreline

Remand Item D: Whether the application, and representations contained therein, are complete and accurate.

How can this application with the current representations be considered complete and accurate? The POCCA keeps moving the discharge location, has changed the diffuser design, conducted a minor amount of testing over the course of 4 days, really 3 ½ days. The POCCA still claims it will not own or operate a desalination facility, yet TCEQ and the EPA believe the POCCA will own and operate the facility. So, which is it? Does it matter who the operator will be? You bet it does. If the application was complete and accurate the first time, why all the changes?

Dr. Dean was asked about the water sample for the intake location. He admitted a water sample was collected about ½ mile offshore of St. Jo's Island, but that location would not be the actual intake site. He was asked if there would be a difference in water quality, especially contaminants, for intake locations further offshore and he said no. Dr. Dean was asked if he noted any ships moored offshore and he vaguely recalled "a few" ships. Here is what we know, on any given day there can be as many as 20 ships moored offshore and rarely is it ever below 10 ships. Why does this matter? Ships moored offshore are well known to discharge bilge water and other pollutants into the Gulf of Mexico. There have been several illegal releases from moored ships. Two years ago, a barge loaded with crude oil exploded, killing 2 crew members and caused an oil spill of several thousand barrels. To make a claim that the water quality at 2- or 3-miles offshore will not have contaminants is arrogant and wrong.

The EPA too disagrees with several representations of this application and how TCEQ has classified the facility. It is supposed to be a MAJOR, not minor facility. In the end, the facility would process water and discharge the waste (salt) into the public waters around Harbor Island.

Remand Item G: Whether the modeling complies with applicable regulations to ensure the Draft Permit is protective of water quality, including utilizing accurate inputs.

Which inputs? The inputs have changed so many times, how would anyone know what is accurate? We already know the intake sample does not reflect the actual intake location. Contaminants may very well be present when a final location is determined, but will not be reflected in the Draft Permit.

Cormix modeling fails to account for another thirty feet of depth at the point of discharge. Cormix also fails to account for what is a cliff wall behind the discharge. If you consider a USGS topographical map, when the elevation lines get tightly close together, a steep slope like a cliff is indicated. The same holds true for the elevation lines below the water surface at Harbor Island and contrary to how the "slope" was expressed. In the end, it is just a simple cliff face.

The water samples required in the draft permit fail to remotely assess the actual effluent discharge in the various zones, i.e., the ZID, ALMZ, and HHMZ. The percent of effluent at the point-of-discharge will just be fed into a computer program that will predict the dilution

percentage at each zone, and no physical water samples will be required at each of the three zones. The ED's witness, Shannon Gibson, agreed we really won't know what the impacts will be until the facility is built and that in the "real world" the modeling is just a guess.

Ms. Gibson agreed red tide blooms do decrease water quality, but there are no provisions or even a mention of red tide in the Draft Permit. Ms. Gibson acknowledged there are no requirements or standards in the Draft Permit to address lower larval recruitment, larval abnormalities, fish deformations, or even possible fish kills. Based on just this information alone, the Draft Permit fails to be protective of water quality and marine life.

We don't pretend to know all the applicable representations, but there are a number of unaddressed concerns according to the EPA letter dated December 15, 2021. "The TCEQ guidance document for reviewing diffusers does not address unsteady ambient flow conditions (i.e., tidal reversing) since tidal reversing is a phenomenon that typically occurs twice per day following each slack tide and represents conditions that only occur for a few minutes each day." As pointed out under Remand Item A, slack tides can be several hours, not always just a few minutes. The EPA further stated, "that WET (testing) is not intended to take the place of any other biological assessment that is appropriate for water quality assessment of this receiving stream."

Remand Item H: Whether the Executive Director's antidegradation review was accurate.

We do not believe there is any way the ED's antidegradation review is accurate. It may have very well been conducted as was required, but it fails to account for natural salinity changes throughout the year. Depending on the season and rainfall, salinity levels can be significantly higher or lower than average. Summer can have very high salinity levels with high temperatures. As the Port's expert, Dr. Dean indicated, higher temperatures and salinities can reduce dissolved oxygen levels. This natural occurrence would only be compounded around the discharge zones and quite possibly further out.

The POCCA had much focus on the Carlsbad, California desalination facility but failed to tell the whole story. Currently that the facility is exceeding permitted levels under California's code. Desalination effluent was combined with cooling water to decrease salinity before discharge, and salinity was permitted at 2.0 psu. A 4-year study showed salinity exceeded the permit level

at 2.7 psu, and the plume exceeds the 200-meter area, extending to 600 meters. Does the ED's antidegradation review account for excessive levels of salinity over long periods of time? Does the antidegradation review consider the possibility of a much larger area for the plume? Does the ED's review account for the 90' hole and brine plume build-up? The answer to our questions is no, none of these valid concerns are addressed by the ED or the POCCA.
Does the ED's antidegradation review take into account the higher salinity levels already occurring in the Nueces Estuary? Vulnerability Assessment of Coastal Bend Bays (December 2021) combines two different sources of salinity data for the bay systems from the last 30 years, not 4 days. The data is clear, salinity levels in the Nueces Estuary have steadily increased and at times during the dry years, exceeds levels supportive of several marine species.

III. Discussion

As our group expressed in the opening statement, we observe these area waters daily, weekly and annually. The citizens that showed up on March 14th, 2021 have jobs that are related in some form or fashion to the Nueces Estuary. We don't pretend to be scientists or experts, instead we know what we see and experience every day on this island.

Contrary to the Port's claim about Harbor Island being industrialized, we again believe it is important to be clear, Harbor Island has NEVER been heavy industrial. The import oil terminal that was on a portion of Harbor Island is a ghost of the past. The current City of Port Aransas zoning from 2014 is classified as HI, but that does not stand for heavy industrial. HI means Harbor Island, period. Because the Port attorneys keep making comparisons between Harbor Island and the Port's inner harbor, twenty miles away, we believe it's important to understand the two locations are nothing alike. Inner harbor at Corpus Christi, also known as "refinery row", is heavy industry with multiple refineries and other industrial production.

In the study, Vulnerability of Coastal Bend Bays (Montagna 2021), there is a section that discusses desalination. As stated in this section, *"The constant concentrate and chemical discharges with high salinity and temperature to the marine environment can be harmful for marine organisms and result in permanent change in species composition, abundance and distribution in discharge sites (Dupavillon and Gillanders 2009)." "Long-term observations of salinity were highly correlated to marine species richness, distribution, and total abundance (Paalme et al. 2020)."*

Harbor Island across from Roberts Point Park—no heavy industry

Harbor Island from Clines Landing – far left is an offload facility for wind turbines (no emissions)

Over the last 4 years, we have held many events informing people of the Port's plans to industrialize a barrier island, including the proposed desalination facility. We started this grass-roots outreach with just a few people and no money, yet somehow, we managed to not only get the word out, but collected thousands of signatures in opposition to desalination discharge.

This aligned pro-se group represents the many that dropped out of the contested case hearing and the thousands of annual visitors who encouraged us to continue through this 2nd Contested Case Hearing. We aren't being unreasonable or anti-industry and have repeatedly stated at public meetings, Port of Corpus Christi meetings and one-on-one to Port personnel, "just take it offshore" and we will shut-up. It does not make sense on numerous levels to add further stress to a vital marine environment that is already at the tipping point when it comes to salinity.

Porpoises in ship channel

As established in literature and numerous testimonies, the Aransas Pass Inlet is the only major tidal pass for the Nueces Estuary. Whether it's called the Aransas Pass or the ship channel, this inlet is essential for larval recruitment of many important species. In essence, if larvae don't make it here, they won't make it anywhere. Lower larval recruitment in the long-term will cause declines in shrimp, crab, and fish populations. As pointed out by well respected scientists, a corresponding domino effect would likely occur for other non-marine species, such as the piping plover and whooping crane.

In your Honors previous decision, a number of reasons were cited as to why you recommended denial of the Port's application. We believe many of those reasons still exist and/or have not been addressed. Here is a brief list from the last Proposal for Decision:

1. Applicant retains the burden of proof on the issues regarding the sufficiency of the Application and compliance with the necessary statutory and regulatory requirements. 30 TAC 80.17

2. There must be no lethality to aquatic organisms that move through a ZID. 30 TAC 307.8 (b)(2).

3. Water in the state must be maintained to preclude adverse toxic effects on aquatic life.30 TAC 307.6 (b)(4).

4. Salinity gradients in estuaries must be maintained to support attainable estuarine-dependent aquatic life uses. 30 TAC 307.4 (g)(3).

5. Careful consideration must be given to all activities that may detrimentally affect salinity gradients. 30 TAC 307.4 (g)(3).

6. The highest water quality sustained since November 28, 1975, defines baseline conditions for determinations of degradation. 30 TAC 307.5 (c)(2)(B).

7. The ED's antidegradation review does not ensure compliance with Tier 1 and Tier 2 antidegradation standards. 30 TAC 307.5 (b).

8. The ED's modeling analysis of the proposed discharge is not sufficient to ensure the Draft Permit is protective of water quality.

9. The Draft Permit is not protective of water quality and the uses of the receiving waters under the applicable TSWQS. 30 TAC, chapter 307.

10. The Draft Permit does not include all the appropriate and necessary requirements to protect the marine environment, aquatic life, wildlife, recreational activities, commercial fishing and fisheries.

IV. Conclusion

We, Stacey Barlett, Jo Ellyn Krueger, Sarah Searight, Lisa Turcotte and spokesperson, Cathy Fulton respectfully request this application again be denied. We believe all the evidence presented by the POCCA and TCEQ failed to address the primary concerns cited by Your Honors, Judge Quinn and Judge Smith, in the previous Hearing on Merits. TCEQ continues to stand by insufficient modeling, and has failed to follow the required EPA guidelines, as evidenced in recent communications between the EPA and TCEQ.

We also make the recommendation that all administrative costs for the hearing be solely the responsibility of the Port of Corpus Christi. The Port has proven they have plenty of money, all of which is PUBLIC money, and it was their choice to not conduct thorough studies and instead cut corners to push this application through. The burden for this waste of time and money should fall only on the POCCA.

Thank you, Judge Quinn and Judge Smith for allowing this aligned group to participate in this hearing. This hearing and all the depositions were informative and our group learned even more about this unique ecosystem. We very much appreciate the efficiency of how the hearing was conducted and are grateful for your patience with our lack of legal skill.

Respectfully Submitted by,

Cathy Fulton for the Aligned Pro-se Group
Stacy Barlett, Jo Ellyn Krueger, Sarah Searight & Lisa Turcotte

Certificate of Service

I hereby certify that on April 12, 2022, the foregoing document was filed with SOAH, the TCEQ Chief Clerk, and copies were served to all parties on the attached list, via email.

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